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Attorneys for Defendants
SAKHAWAT KHAN and ROOMY KHAN

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

VILMA SERRALTA,)	No. C 08-01427 EDL
)	
)	STIPULATION AND [PROPOSED]
Plaintiff,)	ORDER RE: CONFIDENTIALITY OF
)	INFORMATION AND DOCUMENTS
v.)	PRODUCED DURING DISCOVERY
)	
)	
SAKHAWAT KHAN; ROOMY KHAN; and)	[Civ.L.R. 7-12]
DOES ONE through TEN, inclusive,)	
)	
)	
Defendants.)	

The parties, through their undersigned counsel, enter into the following stipulation:

WHEREAS, each party recognizes that some of the documents and information which have been and may be produced in this action may include confidential or private information related to the parties or to non-parties;

WHEREAS, the parties wish to facilitate the free exchange of information during the discovery process while at the same time protecting the privacy interests of the parties and non-parties;

IT IS HEREBY STIPULATED by the parties as follows:

1. All information and documents produced during the discovery process (the “Information”) shall be used for litigation purposes only, and may not be used for any other purpose whatsoever, including, but not limited to, any business or commercial purpose or for dissemination to the media or public. Plaintiff and Defendants shall only be permitted to disclose such Information as follows:

a. As may be reasonably necessary for the prosecution of this litigation by Plaintiff or defense of this litigation by Defendants, including to her or their legal counsel, consultants, and any others who may be designated as expert witnesses, and their respective paralegal, secretarial and clerical employees who are assisting in the preparation and trial of this litigation. Any person given access to the Information shall not make copies, duplicates, extracts, summaries or descriptions of such material, or any portion thereof except for use in connection with this litigation, and each such copy, duplicate, extract, summary or description is to be treated in accordance with the provisions hereof. All such consultants and any others who may be designated as expert witnesses shall be required to indicate in writing their agreement not to use or disclose the Information to any other persons, entities or third parties, except as provided herein;

b. At trial, subject to any protections or limitations ordered by the Court, including *motions in limine* granted by the Court;

c. In support of or in opposition to any motions, stipulations, expert reports, or any other matters or papers that the parties may file in this litigation.

DATED: December 19, 2008

By: /s/Matthew Goldberg
MATTHEW GOLDBERG
Attorney for Plaintiff

DATED: December 19, 2008

By: /s/ Stephen Tausch
STEPHEN TAEUSCH
Attorney for Defendants

1 I, Stephen L. Taeusch, am the ECF User whose identification and password are being
2 used to file this STIPULATION AND [PROPOSED] ORDER RE: CONFIDENTIALITY OF
3 INFORMATION AND DOCUMENTS PRODUCED DURING DISCOVERY. In compliance
4 with General Order 45.X.B, I hereby attest that Matthew Goldberg concurred in this filing.
5

6 Dated: December 19, 2008

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

7 By: /s/Stephen L. Taeusch
8 Stephen L. Taeusch

9 *Attorneys for Defendants Sakhawat and Roomy*
10 *Khan*
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ORDER

Having considered the parties' Stipulation, and good cause appearing,
PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: December ____, 2008

Hon. Claudia Wilken